

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: LEROY CLARENCE HOUSE, JR. : CHAPTER 13
Debtor :
 :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
 :
vs. :
 :
 :
LEROY CLARENCE HOUSE, JR. :
Respondent : CASE NO. 1-24-bk-01781

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 29th day of August, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. The debtor has not demonstrated that all tax returns have been filed as required by § 1325(a)(9). (2020 through 2023 Federal)
2. The plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2E and 2G of the plan. (An officer or managing/registered agent of One Main must be served.)

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 29th day of August, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Chad Julius, Esquire
8150 Derry Street, Suite A
Harrisburg, PA 17111

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee